#### REMARKS

In response to the Office Action mailed March 9, 2007, Applicants respectfully request reconsideration. Claims 1-24 were previously pending in this application. By this amendment, Applicant is canceling claims 24 without prejudice or disclaimer. As a result, claims 1-23 are pending for examination with claims 1, 12 and 23 being independent claims. No new matter has been added.

# Objections to the Specification

The disclosure was objected to because it contained an embedded hyperlink and/or other form of browser-executable code. Paragraph 27 has been amended to remove an embedded hyperlink.

Accordingly, withdrawal of this objection is respectfully requested.

#### Objections to the Claims

Claim 11 was objected to because it has improper dependence. Appropriate correction was required. Applicants have herein corrected the dependency of claim 11. Claim 11 now depends from claim 10.

Accordingly, withdrawal of this objection is respectfully requested.

## Rejections under 35 U.S.C. §101

Claims 23 and 24 were rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Claim 23 has been amended to recite a tangible computer-readable medium and claim 24 has been canceled.

Accordingly, the rejection should be withdrawn.

#### Rejections Under 35 U.S.C. §112

Claims 2, 3 and 10 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. These claims have been amended to correct the informalities noted by the Examiner. Accordingly, the rejection should be withdrawn.

### Rejections Under 35 U.S.C. §102

Claims 1-10, 12-21 and 23-24 were rejected under 35 U.S.C. §102(e) as being anticipated by Leymann et al., U.S. Patent No.6,681,251. Applicants respectfully disagree.

As an aid to the Examiner, Applicants provide a summary of the specification of the present application and of the Leymann reference. This summary is not intended as a substitute for the Examiner reading the application and the reference in their entireties. Also, the summary is not intended to characterize the claims or terms used in the claims, which are discussed individually below.

Briefly, the present application describes a collaboration system in which collaborative clients can exchange data in response to user interactions. Each of the collaboration clients maintains its own copy of collaborative data, which is maintained through the exchange of change requests with other collaborative clients. Within each collaboration client, execution of these data change requests are coordinated so that each collaboration client maintains a common data model.

While it was known to exchange data change requests among collaboration clients, it was not known to provide a desirable method for non-collaborative clients to access collaborative data maintained within the collaboration system. The present application describes, in various embodiments, a server that may facilitate access. The server both provides a mechanism by which a request can be sent to a collaborative client and a mechanism to forward a response to the non-collaborative client.

In contrast, Leymann describes a system that balances workload in clustered application servers. As summarized col. 5, lines 64-67, Leymann describes using a dispatching server to select a server to process a request from a client. The reference does not relate to a collaboration system or to allowing a non-collaborative client to access collaborative data.

As a result, each of the independent claims contains at least one limitation not shown or suggested in the reference. For example, claim 1 recites that: a "request message specifies collaborative data to update or return collaborative data, and the collaborative client provides a response message based on the request message."

Claim 1 further recites unique features of the manner in which the request and response messages can be effectively routed. For example, the claim recites a server: "modifying the request message by replacing the information identifying the non-collaborative client with information identifying a queue in the server." The claim also recites: "sending the response message to the server queue identified in the modified request

message" and "using the information in the server identifying the non-collaborative client to forward the response message from the server queue to the non-collaborative client."

While Lymann describes that a dispatching server may queue requests for application servers to execute, it does not describe renaming messages or sending a response message to a queue or forwarding the response from the queue to a non-collaborative client. The passages of Lymann cited by the Examiner – like the rest of Lymann – describe the general process of using a dispatching server to route requests to application servers and do not teach the specific limitations of claim 1.

Independent claim 12 likewise recites limitations relating to access to a collaborative system by a non-collaborative client, which are not shown or suggested in Lymann. For example, claim 12 recites a server with "means for modifying the request message by replacing the information identifying the non-collaborative client with information identifying a queue in the server." The claim further recites that a "collaborative client provides a response message containing the data and services requested." The apparatus of claim 12 includes "a second communication mechanism for storing the response message in the server queue identified in the modified request message" and "a contact mechanism ... for forwarding the response message from the server queue to the non-collaborative client. Lymann does not teach or suggest these limitations.

Independent claim 23 relates to a computer program product that allows a noncollaborative client to request access to a collaborative system and therefore recites limitations not shown or suggested in Lymann. For example, claim 23 recites "modifying the request message by replacing the information identifying the non-collaborative client with information identifying a queue in the server." The claim further recites that "the collaborative client provides a response message containing the data and services requested from the collaborative system." There is also a program code for "sending the response message to the server queue identified in the modified request message" and "forward the response message from the server queue to the non-collaborative client." These limitations are not shown or suggested in Lymann.

The remaining claims depend, directly or indirectly, from one of the independent claims and distinguish the reference for at least the reasons given above in connection with the independent claims. The dependent claims also recite limitations that further distinguish the reference. For example, claims 2, 3, 13 and 14 relate to use of a convenient name, which has relevance in a collaboration system, but not in the system of Lymann. Claims 4, 5, 15

and 16 recite a relay server, which is not described in Lymann. Claims 9 and 20 recite an event service used for notifications, which is also not described in Lymann.

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Accordingly, the rejection under 35 U.S.C. §102 should be withdrawn.

## Rejections Under 35 U.S.C. §103

Claims 11 and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Leymann et al., U.S. Patent No. 6,681,251 in view of Official Notice.

Though Applicants do not dispute that SOAP is known, Applicants disagree that knowledge of SOAP made it obvious to one of skill in the art to use SOAP in the context of the claims. There is no teaching or suggestion in any of the references to provide access to a collaborative system through a server in a fashion that meets all of the other limitations of either claim 11 or 22. Accordingly, there is no reason to assert that claims 11 and 22 would be obvious, and withdrawal of this rejection is respectfully requested.

#### CONCLUSION

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A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Dated: June 11, 2007

Respectfully submit

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